

Kevin M. Pasquinelli

From: Mindy Morton [mmorton@be-law.com]
Sent: Thursday, March 13, 2008 10:55 AM
To: Kevin M. Pasquinelli
Cc: Gail C. Simmons
Subject: RE: Response to RFPs

Kevin,

I expect that any additional documents will be produced next week.

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From: Kevin M. Pasquinelli [mailto:kpasquinelli@MOUNT.com]
Sent: Wednesday, March 12, 2008 4:12 PM
To: Mindy Morton
Cc: Kevin M. Pasquinelli; Michelle McManus
Subject: Response to RFPs

Mindy,

I have received essentially no production of documents as per our initial request and your agreement to produce. I have received one CD of information which only contained a few documents, which appeared to regard Verigty trade secret and NDA legal policies.

There has been no production of documents related to the 2019 statement's claims of trade secrets, as was agreed to. Please tell me when Verigty will be producing those documents. If not reasonably immediate I will be forced to make a motion to compel.

Kevin

Kevin Pasquinelli, Esq.

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